



Lynn DeGeorge  
Alpine Environmental Coordinator  
Alpine Operations  
CPA HEST-ALP 14  
P.O. Box 196860  
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June 29, 2018

Certified Mail  
Return Receipt Requested  
7017 0530 0000 3354 8659

Clean Air Act Compliance Manager  
U.S. EPA Region 10, Mail Stop: OCE-101  
1200 Sixth Avenue; Suite 900  
Seattle, WA 98101-3140

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JUL 6 2018

EPA - REGION 10  
Office of Compliance and Enforcement

**Subject: NSPS Subpart OOOOa  
Annual Report – April 1, 2017 through March 31, 2018  
Colville River Unit**

Dear Compliance Manager:

ConocoPhillips Alaska, Inc. (CPAI) has enclosed with this letter the annual New Source Performance Standard Subpart OOOOa (NSPS OOOOa) report for the Colville River Unit on the North Slope of Alaska. The annual report covers the period of April 1, 2017 through March 31, 2018.

This is the second annual report submitted by CPAI for the Colville River Unit; the first annual report was submitted June 20, 2017 and was followed by an Amendment on November 20, 2017.

Pursuant to 40 CFR 60.5420a(b), CPAI has elected to submit annual OOOOa reports by June 29<sup>th</sup>. Subsequent reports will cover one-year periods of April 1 through March 31 of the following year (i.e., April 1, 2018 through March 31, 2019).

If you have any questions or require additional information, please call me at (907) 670-24200.

Sincerely,

A handwritten signature in cursive script that reads 'Lynn DeGeorge'.

Lynn DeGeorge  
Alpine Environmental Coordinator

Alpine 109569

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## I. General Information

ConocoPhillips Alaska, Inc.  
700 G Street  
P.O. Box 100360  
Anchorage, AK 99510-0360

Facility Site Name: Coleville River Unit

Location: Alpine Oil Field  
Latitude: 70.34492° (Alpine Central Facility)  
Longitude: -150.92555° (Alpine Central Facility)

## Affected Facilities Included in This Annual Report

| Affected Facilities:  | Subject to Reporting? |
|---|-----------------------|
| Hydraulically fractured/refractured wells [§60.5365a(a)]                                  | Yes                   |
| Centrifugal compressors [§60.5365a(b)]  | No                    |
| Reciprocating compressors [§60.5365a(c)]  | No                    |
| Pneumatic controllers [§60.5365a(d)]  | No                    |
| Storage vessels [§60.5365(e)]   | No                    |
| Group of equipment within a process unit at a natural gas processing plant [§60.5365a(f)] | No                    |
| Sweetening units at natural gas processing plants [§60.5365a(g)]                          | No                    |
| Pneumatic pumps [§60.5365a(h)]  | No                    |
| Fugitive emission components at a well site or compressor station [§60.5365a(i) and (j)]  | Yes                   |

## II. Report Certification

Reporting Period Start: April 1, 2017  
Reporting Period End: March 31, 2018

### Statement of Certification

*Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.*

Signature: \_\_\_\_\_

Mike Lyden/Glynn Jones  
Alpine Operations & Maintenance Superintendent

Date: 6-29-18

### III. Reporting Requirements and Documentation

| Citation   | Requirements   | Data Location    |
|--|--|------------------|
| <b>Well Affected Facilities</b>  |  |                  |
| §60.5420a(b)(2)(i);<br>§60.5420a(c)(1)(i) through<br>§60.5420a(c)(1)(iii)        | I. Records of the following for each well completion operation conducted during the reporting period: <ol style="list-style-type: none"> <li>Well identification name</li> <li>Well location (latitude and longitude to five (5) decimal degrees)</li> <li>API well number</li> <li>Date and time of the onset of flowback following hydraulic fracturing or refracturing</li> <li>Date and time of each attempt to direct flowback to a separator</li> <li>Date and time of each occurrence of returning flowback liquid to well completion or storage vessels (e.g. infeasible to operate separator)</li> <li>Date and time that well was shut in and flowback equipment permanently disconnected</li> <li>Duration of flowback (hours)</li> <li>Duration of gas recovery and type of recovery (hours)</li> <li>Duration of combustion (hours)</li> <li>Duration of venting and reason for venting in lieu of capture or combustion (hours)</li> </ol> | See Attachment 1 |
| §60.5420a(b)(2)(ii); and<br>§60.5420a(c)(2)(ii)                                  | II. Records of deviations during the reporting period as specified in §60.5420a(c)(1)(ii).   |                  |
| §60.5375a(f);<br>§60.5420a(b)(2)(iii);<br>§60.5420a(c)(1)(vii); and<br>§60.5432a | III. Records that support a determination under §60.5432a that the well affected facility is a low pressure well.  |                  |

| Citation   | Requirements  | Data Location    |
|--|---|------------------|
| <b>Fugitive Emission Component Affected Facilities (BOTH WELL SITES AND COMPRESSOR STATIONS)</b> |   |                  |
| §60.5420a(b)(7)  | <p>I. For the collection of fugitive emission components at each well site and/or each compressor station within the company defined area, report for each monitoring survey:</p> <ul style="list-style-type: none"> <li>a. Date of the survey</li> <li>b. Beginning and end time of the survey</li> <li>c. Name of the operator(s) performing survey               <ul style="list-style-type: none"> <li>i. If the survey is performed by optical gas imaging, note the training and experience of the operator(s).</li> </ul> </li> <li>d. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey</li> <li>e. Monitoring instrument used</li> <li>f. Any deviations, or a statement that there were no deviations, from the monitoring plan</li> <li>g. Number and type of fugitive emissions components for which fugitive emissions were detected</li> <li>h. Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h)</li> <li>i. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emissions components monitored</li> <li>j. The date of successful repair of each identified fugitive emissions component</li> <li>k. Number and type of fugitive emissions components placed on delay of repair and explanation for each delay of repair</li> <li>l. Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding</li> </ul> | See Attachment 2 |

## **Attachment 1**

### **Well Affected Facilities [§60.5420a(b)(2)]**

**Table 1-A: Well Flowback Information**

| Well Name     | Well Completion Operation Type | Location of the Well           | API Well Number | Date       | Time Start | Time End | Flowback Stage   | Duration of Flowback <sup>1</sup> (hr/day) | Duration of Recovery to Flow Line <sup>2</sup> (hr/day) | Duration of Combustion (hr/day) | Duration of Venting (hr/day) | Reasons for Venting in Lieu of Capture or Combustion | Exception Claimed Under §60.5375a(a)(3) | Comments/Explanation                                |
|---------------|--------------------------------|--------------------------------|-----------------|------------|------------|----------|------------------|--|---|---------------------------------|------------------------------|--|---|---|
| CD2-468       | Routine Development            | Lat:70.33806<br>Long:151.04081 | 50-103-20587-00 | 3/1/2018   | 4:30       | 4:30     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD3-111A      | Routine Development            | Lat:70.41908<br>Long:150.91419 | 50-103-20526-01 | 4/22/2017  | 9:00       | 9:00     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-17 A-Sand | Routine Development            | Lat:70.31340<br>Long:151.22509 | 50-103-20754-00 | 6/23/2017  | 20:30      | 20:30    | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-20 A-Sand | Routine Development            | Lat:70.31335<br>Long:151.22555 | 50-103-20752-00 | 4/7/2017   | 0:00       | 0:00     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-20 C-Sand | Routine Development            | Lat:70.31335<br>Long:151.22555 | 50-103-20752-00 | 4/12/2017  | 0:00       | 0:00     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-22        | Routine Development            | Lat:70.31332<br>Long:151.22586 | 50-103-20759-00 | 11/28/2017 | 9:30       | 9:30     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
|               |                                |                                |                 | 11/29/2017 | 13:00      | 16:00    | Initial Flowback | 3.0  | 0.0   | N/A                             | 3.0                          | Too much frac sand to run to separator               | N/A                                     | Sparged separator vessel to remove flowback solids. |
|               |                                |                                |                 | 11/29/2017 | 16:00      | 16:00    | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-23        | Routine Development            | Lat:70.31331<br>Long:151.22602 | 50-103-20761-00 | 1/31/2018  | 0:00       | 0:00     | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |
| CD5-25        | Routine Development            | Lat:70.31328<br>Long:151.22633 | 50-103-20765-00 | 3/23/2018  | 18:00      | 18:00    | N/A              | N/A  | N/A   | N/A                             | N/A                          | N/A  | N/A                                     | Straight to Production                              |

**Notes:**

1. If the daily "Duration of Flowback" is listed as "0.0", this indicates the well was shut-in for the entire day and no flowback occurred. If "Duration of Flowback" is non-zero, but recovery, combustion and venting are listed as "0.0", this indicates the well did not produce any gas.
2. Wildcat, delineation and low pressure wells are not required to reporting the Duration of Recovery to Flow Line [§60.5420a(c)(1)(iii)(B)]

**Table 1-B: Well Affected Facility Deviations from §60.5375a**

| Well Name   | Deviation Description | Comments |
|---|-----------------------|----------|
| CPAI did not have any deviations during well completion operations with hydraulic fracturing during the Reporting Period. |                       |          |

**Table 1-C: Well Affected Facility Low Pressure Well Supporting Information**

| Well Name   | Results of Low Pressure<br>Well Equation<br>(psia) | Supporting<br>Calculations Attached? |
|---|--|--------------------------------------|
| CPAI did not have any low pressure wells during the Reporting Period. |  |                                      |



## **Attachment 2**

### **Fugitive Emission Component Affected Facilities [§60.5420a(b)(7)]**

**Table 2-A: Fugitive Emission Component Affected Facility Records**

| Survey No. | Location Name        | Date of Survey | Survey Start Time | Survey End Time | Name of Survey Operator(s) | Survey Instrument | For OGI Camera Only                         |  | Survey Conditions        |                          |                |
|------------|----------------------|----------------|-------------------|-----------------|----------------------------|-------------------|---|--|--------------------------|--------------------------|----------------|
|            |                      |                |                   |                 |                            |                   | Operator Has Company Specific OGI Training? | Duration of Operator OGI Camera Experience | Ambient Temperature (°F) | Maximum Wind Speed (MPH) | Sky Conditions |
| 1          | Alpine Drillsite CD2 | 5/12/2017      | 9:45 AM           | 3:30 PM         | Jason Solsvig/L. Fancher   | OGI Camera        | Yes   | 6 Hrs.                                     | 30.0                     | 13.0                     | Cloudy         |
| 2          | Alpine Drillsite CD3 | 5/13/2017      | 7:30 AM           | 3:30 PM         | Jason Solsvig/L. Fancher   | OGI Camera        | Yes   | 6 Hrs.                                     | 30.0                     | 12.0                     | Cloudy         |
| 3          | Alpine Drillsite CD5 | 5/14/2017      | 9:30 AM           | 11:30 AM        | Jason Solsvig/L. Fancher   | OGI Camera        | Yes   | 6 Hrs.                                     | 28.0                     | 6.0                      | Cloudy         |
| 4          | Alpine Drillsite CD5 | 9/21/2017      | 9:00 AM           | 10:30 AM        | Ryan Thrapp                | OGI Camera        | Yes   | 38 Hrs.                                    | 33.0                     | 13.0                     | Cloudy         |
| 5          | Alpine Drillsite CD2 | 9/22/2017      | 9:20 AM           | 3:45 PM         | Ryan Thrapp                | OGI Camera        | Yes   | 38 Hrs.                                    | 35.0                     | 13.0                     | Cloudy         |
| 6          | Alpine Drillsite CD3 | 9/24/2017      | 10:05 AM          | 12:30 PM        | Ryan Thrapp                | OGI Camera        | Yes   | 38 Hrs.                                    | 39.0                     | 6.0                      | Cloudy         |

**Table 2-B: Fugitive Emission Component Affected Facility Monitoring Survey Records**

| Survey No. | Component Type Found Leaking | Count of Leaking Components Found | Count of Components Placed on Delay of Repair | Count of Components Repaired and Resurveyed During Initial Finding | Count of Components NOT Repaired per §60.5397a(h) | Count of Difficult-to-Monitor Components Surveyed | Count of Unsafe-to-Monitor Components Surveyed |
|------------|------------------------------|-----------------------------------|---|--|---|---|--|
| 1          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 3                                 | 0   | 2  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 6                                 | 0   | 5  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 4                                 | 0   | 2  | 0   | 0   | 0  |
| 2          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 1                                 | 0   | 1  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 7                                 | 0   | 7  | 0   | 0   | 0  |
| 3          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 2                                 | 0   | 2  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 1                                 | 0   | 1  | 0   | 0   | 0  |
| 4          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 1                                 | 0   | 1  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 0                                 | 0   | 0  | 0   | 0   | 0  |
| 5          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 1                                 | 0   | 1  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 14                                | 0   | 12   | 0   | 0   | 0  |
| 6          | Compressor                   | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Connector                    | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Flange                       | 1                                 | 0   | 1  | 0   | 0   | 0  |
|            | Open-Ended Line              | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Other                        | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Pressure Relief Device       | 0                                 | 0   | 0  | 0   | 0   | 0  |
|            | Valve                        | 3                                 | 0   | 3  | 0   | 0   | 0  |

**Table 2-C: Fugitive Emission Component Affected Facility Reasons for Delay of Repair**

| Survey No.   | Component Type Placed on Delay of Repair | Reason for Each Delay of Repair |
|--|--|---------------------------------|
| <i>CPAI did not place any fugitive emission components on delay of repair during the reporting period.</i> |  |                                 |

**Table 2-D: Fugitive Emission Component Affected Facility Emission Monitoring Plan (EMP) Deviations**

| Survey No.  | Deviations from EMP? | Describe Deviation(s) |
|---|----------------------|-----------------------|
| <i>CPAI did not have any deviations from the affected facility EMP during the reporting period.</i> |                      |                       |

**Table 2-E: Fugitive Emission Component Affected Facility Repair and Resurvey Records**

| Survey No. | Component Type Found Leaking | Leak Tag ID | Date of Successful Repair | Resurvey Instrument |
|------------|------------------------------|-------------|---------------------------|---------------------|
| 1          | Valve                        | 0226        | 5/27/2017                 | OGI Camera          |
| 1          | Other                        | 0241        | 5/12/2017                 | OGI Camera          |
| 1          | Flange                       | 0242        | 5/12/2017                 | OGI Camera          |
| 1          | Valve                        | 0243        | 5/12/2017                 | OGI Camera          |
| 1          | Other                        | 0244        | 5/12/2017                 | OGI Camera          |
| 1          | Other                        | 0245        | 5/12/2017                 | OGI Camera          |
| 1          | Valve                        | 0246        | 5/27/2017                 | OGI Camera          |
| 1          | Valve                        | 0247        | 5/12/2017                 | OGI Camera          |
| 1          | Flange                       | 0248        | 5/27/2017                 | OGI Camera          |
| 1          | Flange                       | 0249        | 5/12/2017                 | OGI Camera          |
| 1          | Other                        | 0250        | 5/12/2017                 | OGI Camera          |
| 1          | Other                        | 0251        | 5/12/2017                 | OGI Camera          |
| 1          | Other                        | 0252        | 5/27/2017                 | OGI Camera          |
| 2          | Valve                        | 0233        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0234        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0235        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0236        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0237        | 5/13/2017                 | OGI Camera          |
| 2          | Flange                       | 0238        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0239        | 5/13/2017                 | OGI Camera          |
| 2          | Valve                        | 0240        | 5/13/2017                 | OGI Camera          |
| 3          | Other                        | 0230        | 5/14/2017                 | OGI Camera          |
| 3          | Other                        | 0231        | 5/14/2017                 | OGI Camera          |
| 3          | Valve                        | 0418        | 5/14/2017                 | OGI Camera          |
| 4          | Other                        | 0232        | 9/21/2017                 | OGI Camera          |
| 5          | Valve                        | 0228        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0229        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0401        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0402        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0403        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0404        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0405        | 9/22/2017                 | OGI Camera          |
| 5          | Other                        | 0406        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0407        | 9/28/2017                 | OGI Camera          |
| 5          | Valve                        | 0408        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0409        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0410        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0411        | 9/28/2017                 | OGI Camera          |
| 5          | Valve                        | 0412        | 9/22/2017                 | OGI Camera          |
| 5          | Valve                        | 0413        | 9/22/2017                 | OGI Camera          |
| 6          | Flange                       | 0414        | 9/24/2017                 | OGI Camera          |
| 6          | Valve                        | 0415        | 9/24/2017                 | OGI Camera          |
| 6          | Valve                        | 0416        | 9/24/2017                 | OGI Camera          |
| 6          | Valve                        | 0417        | 9/24/2017                 | OGI Camera          |



Laura Perry  
Coordinator - Air Quality  
ConocoPhillips Alaska, Inc.  
Health, Safety & Environmental  
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Laura.Perry@conocophillips.com



CERTIFIED MAIL  
7017-0660-0000-0430-1818

February 15, 2018

Alaska Department of Environmental Conservation  
Mr. Jim Plosay  
Air Permits Program Manager  
410 Willoughby Avenue, Suite 303  
Juneau, Alaska 99801-1795

**RE: Alpine Central Processing Facility, Operating Permit No. AQ0489TVP02  
Off-Permit Change Notification  
NSPS Subpart OOOOa Applicability**

Dear Mr. Plosay:

ConocoPhillips Alaska, Inc. (CPAI) is submitting this notification of an off-permit change pursuant to 40 CFR 71.6(a)(12)(ii) for the Alpine Central Processing Facility (Alpine CPF) stationary source located at the Alpine Oilfield, Alaska. The purpose of this notice is to formally notify the Department that NSPS Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015) has become applicable to this stationary source. The Alpine CPF operates under the approval of Air Quality Operating Permit No. AQ0489TVP02, issued by the Department on February 1, 2016.

#### **Background and Description of Change**

On February 15, 2017, the CD2 Drill Site became a "Collection of Fugitive Emissions Components at a Well Site" affected facility for the well site leak detection and repair (LDAR) requirements under 40 CFR 60.5365a(i). CPAI drilled a new well at the existing CD2 Drill Site thereby triggering the "modification" requirements pursuant to 40 CFR 60.5365a(i)(3)(i).

On April 13, 2017, the CD3 Drill Site also became an affected facility for the NSPS OOOOa well site LDAR requirements pursuant to 40 CFR 60.5365a(i)(3)(i).

On April 13, 2017, CPAI hydraulically fractured a new well (CD3-111A) thereby triggering the Well Completion Operation requirements in NSPS Subpart OOOOa for "well" affected facilities as described in 40 CFR 60.5365a(a).

#### **Change in Emissions**

Volatile Organic Compound (VOC) emissions are regulated by NSPS Subpart OOOOa. NSPS Subpart OOOOa creates standards that reduce fugitive VOC emissions. There has been no change in non-fugitive VOC emissions at the Alpine CPF as a result of NSPS Subpart OOOOa becoming applicable.

#### **Requirements that Apply as a Result of the Change**

##### **NSPS OOOOa LDAR Requirements:**

As a result of the Alpine CD2 and CD3 drill sites becoming "Collection of Fugitive Emissions at a Well Site" affected facilities, CPAI must comply with the well site LDAR requirements in 40 CFR 60.5397a, et seq (see 40 CFR 60.5397a(a) and 40 CFR 60.5410a(j)).

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These requirements include:

- Develop a fugitive emissions monitoring plan;
- Complete an initial monitoring survey within 60 days after first day of production or startup of production, as applicable, or before June 3, 2017; whichever is later;
- Following initial monitoring surveys, conduct semi-annual routine monitoring surveys;
- Repair or replace fugitive emission components leaks no later than 30 calendar days after detection unless the fugitive emission component qualifies for Delay of Repair pursuant to 40 CFR 60.5397a(h)(2);
- Resurvey fugitive emission components no later than 30 days after repair or replacement to verify no fugitive emissions are present;
- Keep records of each monitoring survey and repair activities as specified in 40 CFR 60.5420a(c)(15); and
- Submit annual reports that include the information specified in 40 CFR 60.5420a(b)(1) and (7).

**NSPS OOOOa Well Completion Operation Requirements:**

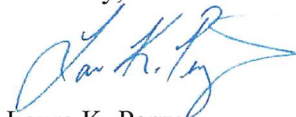
CPAI must comply with the Well Completion Operation requirements in 40 CFR 60.5375a, et seq, 40 CFR 60.5410a(a), and 40 CFR 60.5415a(a) for "well" affected facilities. These requirements include:

- As applicable, submit the notification required in 40 CFR 5420a(a)(2);
- Utilize a separator once it is technically feasible for one to operate during the flowback following hydraulic fracture or refracture;
- Well completion operations conducted on or after 11/30/16 must perform reduced emission completions (REC) unless the well qualifies as a wildcat, delineation, or low pressure well. If it is technically infeasible to conduct REC or the well qualifies as a wildcat, delineation, or low pressure well, the recovered gas from the separation flowback stage must be routed to a completion combustion device (CCD) unless it may negatively impact the tundra, permafrost, or waterways. The CCD must be equipped with a reliable continuous pilot flame;
- Keep records as specified in 40 CFR 60.5420a(c)(1); and
- Submit annual reports that include the information specified in 40 CFR 60.5420a(b)(1) and (2).

Other requirements of NSPS Subpart OOOOa may also become applicable at a future time. CPAI will comply with the applicable provisions of NSPS Subpart OOOOa as summarized above and will comply with any additional provisions of the subpart as they become applicable to Alpine CPF<sup>1</sup>. CPAI will provide to the Department proposed permit language to address the applicable provisions of Subpart OOOOa at a later date.

Please contact me at (907) 265-6937 or by email at [laura.perry@conocophillips.com](mailto:laura.perry@conocophillips.com) should you have any questions regarding this notification or require any additional information.

Sincerely,



Laura K. Perry  
Coordinator – Air Quality

cc: US EPA Region 10, Part 70 Operating Permit Program, M/S OAW-150, 1200 Sixth Avenue,  
Suite 900, Seattle, WA 98101

---

<sup>1</sup> As previously discussed with Jim Baumgartner and Moses Coss, CPAI does not intend to notify the Department when additional well sites and wells become affected facilities under NSPS Subpart OOOOa and are subject to the same requirements as those listed in this notification. However, CPAI will notify the Department again if/when a new category of affected facility with requirements that differ from those stated in this notification is triggered under Subpart OOOOa.



**Certification Statement**  
**[18 AAC 50.205]**

Stationary Source Name(s):     Alpine Central Processing Facility (CPF)  
   Off-Permit Change Notification  
   NSPS Subpart OOOOa Applicability

*"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."*

  
\_\_\_\_\_  
Responsible Company Official

9 FEBRUARY 2018  
Date

Misty Alexa  
Printed Name

Manager, WNS Operations  
Title

ConocoPhillips Alaska, Inc.  
Company





Lynn DeGeorge/Sam Widmer  
WNS Environmental Coordinator  
P.O. Box 196860  
Anchorage, AK 99519  
(907) 670-4200 (phone)  
n1838@conocophillips.com

November 20, 2017

Certified Mail  
Return Receipt Requested  
7017 0530 0000 3354 8390

Clean Air Compliance Manager  
U.S. EPA – Region 10, OCE-101  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

DEC - 1 2017

Subject: NSPS Subpart OOOOa  
Annual Report - September 18, 2015 through March 31, 2017 -  
Amendment  
Alpine Central Processing Facility – Colville River Unit

Dear Compliance Manager,

ConocoPhillips Alaska, Inc. (CPAI) submits the enclosed amended annual OOOOa report for the Colville River Unit on the North Slope of Alaska.

The previous report flowback times have been revised since they went straight to production and there was no venting during this time.

No content in this report was affected by the 90-day stay for the OOOOa rule which became effective on June 2, 2017.

Should you have any questions regarding this submittal, please contact the Alpine Environmental Coordinator at (907) 670-4200.

Sincerely,

Lynn DeGeorge/Sam Widmer  
Environmental Coordinator

Enclosures

109569

## Table of Contents

- I. General Information
- II. Report Certification
- III. Reporting Requirements and Documentation
  - Attachment 1 – Well Affected Facilities [§60.5420a(b)(2)]

## I. General Information

ConocoPhillips Alaska, Inc.  
700 G Street  
P.O. Box 100360  
Anchorage, AK 99510-0360

Facility Site Name: Alpine Drill Sites

Location: Alpine Oil Field  
Latitude: 70.34492° (Alpine Central Facility)  
Longitude: -150.92555° (Alpine Central Facility)

DEC - 1 2017

## Affected Facilities Included in This Annual Report

| Affected Facilities:   | Subject to Reporting? |
|--|-----------------------|
| Hydraulically fractured/refracted wells [§60.5365a(a)]                           | Yes                   |
| Centrifugal compressors [§60.5365a(b)]   | No                    |
| Reciprocating compressors [§60.5365a(c)]   | No                    |
| Pneumatic controllers [§60.5365a(d)]   | No                    |
| Storage vessels [§60.5365(e)]  | No                    |
| Pneumatic pumps [§60.5365a(h)]   | No                    |
| Fugitive emission components at a well site or compressor station [§60.5365a(i)] | No                    |

## II. Report Certification

Reporting Period Start: September 18, 2015

Reporting Period End: March 31, 2017

### Statement of Certification

*Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.*

Signature: Mike Lyden  
Mike Lyden/Glynn Jones  
Alpine Operations & Maintenance Superintendent

Date: 11-19-17

### III. Reporting Requirements and Documentation

| Citation   | Requirements   | Data Location   |
|--|--|---|
| <b>Well Affected Facilities</b>  |  |   |
| §60.5420a(b)(2)(i);<br>§60.5420a(c)(1)(i) through<br>§60.5420a(c)(1)(iii)        | I. Records of the following for each well completion operation conducted during the reporting period: <ol style="list-style-type: none"> <li>Well identification name</li> <li>Well location (latitude and longitude to five (5) decimal degrees)</li> <li>API well number</li> <li>Date and time of the onset of flowback following hydraulic fracturing or refracturing</li> <li>Date and time of each attempt to direct flowback to a separator</li> <li>Date and time of each occurrence of returning flowback liquid to well completion or storage vessels (e.g. infeasible to operate separator)</li> <li>Date and time that well was shut in and flowback equipment permanently disconnected</li> <li>Duration of flowback (hours)</li> <li>Duration of gas recovery and type of recovery (hours)</li> <li>Duration of combustion (hours)</li> <li>Duration of venting and reason for venting in lieu of capture or combustion (hours)</li> </ol> | See Attachment 1, Table 1-A                                       |
| §60.5420a(b)(2)(ii); and<br>§60.5420a(c)(2)(ii)                                  | II. Records of deviations during the reporting period as specified in §60.5420a(c)(1)(ii).   | No well affected facility deviations during the reporting period. |
| §60.5375a(f);<br>§60.5420a(b)(2)(iii);<br>§60.5420a(c)(1)(vii); and<br>§60.5432a | III. Records that support a determination under §60.5432a that the well affected facility is a low pressure well.  | No low pressure well designations during the reporting period     |

## **Attachment 1**

### **Well Affected Facilities [§60.5420a(b)(2)]**

**Well Affected Facilities**

**Table 1-A: Well Flowback Information**

| Well Name | Well Completion Operation Type | Location of the Well<br>Lat: 70.31362<br>Long: -151.2229 | API Well Number | Date      | Time Start | Time End | Flowback Stage      | Duration of Flowback <sup>1</sup><br>(hr/day) | Duration of Recovery to Flow Line <sup>2</sup><br>(hr/day) | Duration of Combustion<br>(hr/day) | Duration of Venting<br>(hr/day) | Reasons for Venting in Lieu of Capture or Combustion | Exception Claimed Under §60.5375a(a)(3) | Comments/Explanation   |
|-----------|--------------------------------|--|-----------------|-----------|------------|----------|---------------------|---|--|------------------------------------|---------------------------------|--|---|--|
| CD5-03    | Routine Development            |  | 501032071800-00 | 2/29/2016 | 8:15 PM    | 8:15 PM  | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-04    | Routine Development            | Lat: 70.31361<br>Long: -151.2231                         | 501032071100-00 | 2/25/2016 | 11:00 PM   | 11:30 PM | Separation Flowback | 0.50  | 0.50   | N/A                                | N/A                             | N/A  | N/A                                     | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. |
| CD5-05    | Routine Development            | Lat: 70.31359<br>Long: -151.2232                         | 501032071200-00 | 2/21/2016 | 10:30 AM   | 11:00 AM | Separation Flowback | 0.50  | 0.50   | N/A                                | N/A                             | N/A  | N/A                                     | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. |
| CD5-09    | Routine Development            | Lat: 70.31353<br>Long: -151.2238                         | 501032072300-00 | 3/29/2016 | 2:00 PM    | 2:00 PM  | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-10    | Routine Development            | Lat: 70.31351<br>Long: -151.224                          | 501032072400-00 | 4/1/2016  | 1:00 AM    | 1:00 AM  | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-11    | Routine Development            | Lat: 70.3135<br>Long: -151.2242                          | 501032072600-00 | 4/5/2016  | 3:00 AM    | 3:00 AM  | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-18    | Routine Development            | Lat: N70° 18' 48.187"<br>Long: W151° 13' 30.869"         | 501032075000-00 | 2/13/2017 | 10:30 PM   | 10:30 PM | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-99    | Routine Development            | Lat: N70° 18' 49.211"<br>Long: W151° 13' 20.820"         | 501032074800-00 | 2/9/2017  | 11:00 PM   | 11:00 PM | N/A                 | N/A   | N/A  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |

**Notes:**

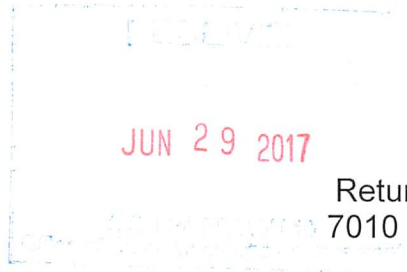
1. If the daily "Duration of Flowback" is listed as "0.0", this indicates the well was shut-in for the entire day and no flowback occurred. If "Duration of Flowback" is non-zero, but recovery, combustion and venting are listed as "0.0", this indicates the well did not produce any gas.
2. Wildcat, delineation and low pressure well sa re not required to reporting the Duration of Recovery to Flow Line [§60.5420a(c)(1)(iii)(B)]





Lynn DeGeorge/Sam Widmer  
WNS Environmental Coordinator  
P.O. Box 196860  
Anchorage, AK 99519  
(907) 670-4200 (phone)  
n1838@conocophillips.com

June 21, 2017



Certified Mail  
Return Receipt Requested  
7010 3090 0002 2170 4558

Clean Air Compliance Manager  
U.S. EPA – Region 10, OCE-101  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

Subject: NSPS Subpart OOOOa  
Annual Report - September 18, 2015 through March 31, 2017  
→ Alpine Central Processing Facility – Colville River Unit

Dear Compliance Manager,

As required in 40 CFR 60.5420a(b), ConocoPhillips Alaska, Inc. (CPAI) submits the enclosed annual OOOOa report for the Colville River Unit on the North Slope of Alaska.

Per 40 CFR 60.5420a(b), the initial annual report for OOOOa is due, “no later than 90 days after the end of the initial compliance period as determined according to §60.5410a.” The initial compliance period began on August 2, 2016, and ends August 1, 2017; therefore, the first annual report would be due by October 30, 2017.

Pursuant to §60.5420a(b), CPAI may arrange with the administrator a common schedule on which reports may be submitted so long as the schedule does not extend the reporting period. CPAI has elected to submit the annual OOOOa on June 29, 2017 (and by June 29<sup>th</sup> of all subsequent years). June 29, 2017 covers a reporting period of less than one year (reporting sooner than October 30, 2017), and therefore satisfies the requirement for an alternate reporting deadline.

As New Source Performance Standard (NSPS) subpart OOOOa became effective on August 2, 2016, but contained retroactive applicability for affected facilities through September 18, 2015, CPAI’s initial report is for the period of September 18, 2015 through March 31, 2017. Given CPAI’s operations during this time, only well affected facilities required reporting in this initial OOOOa report. \*

No content in this report was affected by the 90-day stay for the OOOOa rule which became effective on June 2, 2017.

109569

AK/Compl-

U. S. Environmental Protection Agency  
Office of Air Quality  
Page 2

Subject: NSPS Subpart OOOOa  
Annual Report – September 18, 2015 through March 31, 2017  
Colville River Unit

Should you have any questions regarding this submittal, please contact the Kuparuk Environmental Coordinator at (907) 670-4200.

Sincerely,



Lynn DeGeorge/Sam Widmer  
Environmental Coordinator

Enclosures



## Table of Contents

- I. General Information
- II. Report Certification
- III. Reporting Requirements and Documentation
  - Attachment 1 – Well Affected Facilities [§60.5420a(b)(2)]

## I. General Information

ConocoPhillips Alaska, Inc.  
700 G Street  
P.O. Box 100360  
Anchorage, AK 99510-0360

Facility Site Name: Alpine Drill Sites  
  
Location: Alpine Oil Field  
Latitude: 70.34492° (Alpine Central Facility)  
Longitude: -150.92555° (Alpine Central Facility)

### Affected Facilities Included in This Annual Report

| Affected Facilities:   | Subject to Reporting? |
|--|-----------------------|
| Hydraulically fractured/refracted wells [§60.5365a(a)]                           | Yes                   |
| Centrifugal compressors [§60.5365a(b)]   | No                    |
| Reciprocating compressors [§60.5365a(c)]   | No                    |
| Pneumatic controllers [§60.5365a(d)]   | No                    |
| Storage vessels [§60.5365(e)]  | No                    |
| Pneumatic pumps [§60.5365a(h)]   | No                    |
| Fugitive emission components at a well site or compressor station [§60.5365a(i)] | No                    |

## II. Report Certification

Reporting Period Start: September 18, 2015  
Reporting Period End: March 31, 2017

### Statement of Certification

*Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.*

Signature: Mike Lyden  
Mike Lyden/Glynn Jones  
Alpine Operations & Maintenance Superintendent

Date: 6-22-17

### III. Reporting Requirements and Documentation

| Citation   | Requirements   | Data Location   |
|--|--|---|
| <b>Well Affected Facilities</b>  |  |   |
| §60.5420a(b)(2)(i);<br>§60.5420a(c)(1)(i) through<br>§60.5420a(c)(1)(iii)        | I. Records of the following for each well completion operation conducted during the reporting period: <ol style="list-style-type: none"> <li>Well identification name</li> <li>Well location (latitude and longitude to five (5) decimal degrees)</li> <li>API well number</li> <li>Date and time of the onset of flowback following hydraulic fracturing or refracturing</li> <li>Date and time of each attempt to direct flowback to a separator</li> <li>Date and time of each occurrence of returning flowback liquid to well completion or storage vessels (e.g. infeasible to operate separator)</li> <li>Date and time that well was shut in and flowback equipment permanently disconnected</li> <li>Duration of flowback (hours)</li> <li>Duration of gas recovery and type of recovery (hours)</li> <li>Duration of combustion (hours)</li> <li>Duration of venting and reason for venting in lieu of capture or combustion (hours)</li> </ol> | See Attachment 1, Table 1-A                                       |
| §60.5420a(b)(2)(ii); and<br>§60.5420a(c)(2)(ii)                                  | II. Records of deviations during the reporting period as specified in §60.5420a(c)(1)(ii).   | No well affected facility deviations during the reporting period. |
| §60.5375a(f);<br>§60.5420a(b)(2)(iii);<br>§60.5420a(c)(1)(vii); and<br>§60.5432a | III. Records that support a determination under §60.5432a that the well affected facility is a low pressure well.  | No low pressure well designations during the reporting period     |

## **Attachment 1**

### **Well Affected Facilities [§60.5420a(b)(2)]**

**Well Affected Facilities**

**Table 1-A: Well Flowback Information**

| Well Name | Well Completion Operation Type | Location of the Well<br>Lat: 70.31362<br>Long: -151.2229 | API Well Number | Date      | Time Start | Time End | Flowback Stage      | Duration of Flowback <sup>1</sup><br>(hr/day) | Duration of Recovery to Flow Line <sup>2</sup><br>(hr/day) | Duration of Combustion<br>(hr/day) | Duration of Venting<br>(hr/day) | Reasons for Venting in Lieu of Capture or Combustion   | Exception Claimed Under §60.5375a(a)(3) | Comments/Explanation   |
|-----------|--------------------------------|--|-----------------|-----------|------------|----------|---------------------|---|--|------------------------------------|---------------------------------|--|---|--|
| CD5-03    | Routine Development            | Lat: 70.31362<br>Long: -151.2229                         | 501032071800-00 | 2/29/2016 | 8:15 PM    | 8:30 AM  | Separation Flowback | 61.00   | 61.00  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-04    | Routine Development            | Lat: 70.31361<br>Long: -151.2231                         | 501032071100-00 | 2/25/2016 | 11:00 PM   | 8:30 PM  | Separation Flowback | 70.30   | 70.30  | In Service N/A                     | 0.50                            | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. | N/A                                     | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. |
| CD5-05    | Routine Development            | Lat: 70.31359<br>Long: -151.2232                         | 501032071200-00 | 2/21/2016 | 10:30 AM   | 12:00    | Separation Flowback | 74.00   | 74.00  | In Service N/A                     | 0.50                            | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. | N/A                                     | Production temporarily taken to tanks (30 mins) to remove backpressure to bring well back on production. |
| CD5-09    | Routine Development            | Lat: 70.31353<br>Long: -151.2238                         | 501032072300-00 | 3/29/2016 | 2:00 PM    | 2:00 PM  | Separation Flowback | 48.50   | 48.50  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-10    | Routine Development            | Lat: 70.31351<br>Long: -151.224                          | 501032072400-00 | 4/1/2016  | 1:00 AM    | 7:00 PM  | Separation Flowback | 90.50   | 90.50  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-11    | Routine Development            | Lat: 70.3135<br>Long: -151.2242                          | 501032072600-00 | 4/5/2016  | 3:00 AM    | 3:00 PM  | Separation Flowback | 60.50   | 60.50  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-18    | Routine Development            | Lat: N70° 18' 48.187"<br>Long: W151° 13' 30.869"         | 501032075000-00 | 2/13/2017 | 10:30 PM   | 1:45 PM  | Separation Flowback | 63.25   | 63.25  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-20    | Routine Development            | Lat: N70° 18' 48.073"<br>Long: W151° 13' 31.987"         | 501032075200-00 | 4/7/2017  | 3:00 AM    | 12:00 AM | Separation Flowback | 93.00   | 93.00  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD5-99    | Routine Development            | Lat: N70° 18' 49.211"<br>Long: W151° 13' 20.820"         | 501032074800-00 | 2/9/2017  | 11:00 PM   | 11:00 PM | Separation Flowback | 72.00   | 72.00  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |
| CD3-111   | Routine Development            | Lat: N70° 25' 08.699"<br>Long: W150° 54' 51.095"         | 501032052601-00 | 4/22/2017 | 9:00 AM    | 12:00 PM | Separation Flowback | 51.00   | 51.00  | N/A                                | N/A                             | N/A  | N/A                                     | Straight to Production   |

**Notes:**

1. If the daily "Duration of Flowback" is listed as "0.0", this indicates the well was shut-in for the entire day and no flowback occurred. If "Duration of Flowback" is non-zero, but recovery, combustion and venting are listed as "0.0", this indicates the well did not produce any gas.
2. Wildcat, delineation and low pressure well sa re not required to reporting the Duration of Recovery to Flow Line [§60.5420a(c)(1)(iii)(B)]